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January 14, 2021

Hon. Diane Gujarati, U.S.D.J.  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**RE: Kamin Health v. Pinchas Halperin, et. ano. (20-5574)**

Dear Judge Gujarati:

The undersigned is counsel to the Defendants in the above-referenced matter. On December 31, 2021, Plaintiff filed a motion for interlocutory relief [DE-13]. On January 6, 2021, the Court issued a Scheduling Order requiring opposition to be filed by today. It was our intention to file opposition and cross-move for an Order compelling arbitration, however I have been involved in a hotly contested Adversary Proceeding before Judge Drain in the Southern District Bankruptcy Court which culminated in a hearing today on an *in limine* motion. The matter has been occupying my time virtually exclusively for the past week and a half. As a result, I have not been able to complete Defendants' opposition and cross-motion papers and respectfully request an additional week (through January 22<sup>nd</sup>) to do so.

I requested the consent of opposing counsel to this request, however I have not heard back from him as of the time of the writing of this letter and wanted to get it to the Court before the close of business.

Thank you in advance for your consideration.

Respectfully,



MICHAEL LEVINE

cc. Adam Pollock, Esq. (via ECF and e-mail)